

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

DEIRDRE YOUNG,

Plaintiff,

v.

Case No.: 1:23-cv-00445

WASHINGTON GAS LIGHT COMPANY,

and

TEMPORARY SOLUTIONS, INC.

Defendants.

**DEFENDANT TEMPORARY SOLUTIONS, INC.’S NOTICE TO THE COURT
REGARDING DEPOSITION DESIGNATIONS**

Pursuant to the Court’s direction at the recent motion hearing regarding Defendants Temporary Solutions, Inc.’s (“Temporary Solutions”) and Washington Gas Light Co.’s (“Washington Gas”) respective summary judgment motions, Temporary Solutions hereby files this notice informing the Court that there are no outstanding objections to Temporary Solutions’ deposition designations that require rulings prior to trial.

On February 21, 2024, Temporary Solutions filed deposition designations for Mr. Kevin Dunn and Mr. Thomas Robb. (*See* ECF No. 45.) Neither witness is associated with Temporary Solutions, and Temporary Solutions does not control Mr. Dunn nor Mr. Robb’s attendance at trial. Accordingly, Temporary Solutions provided deposition designations for Mr. Dunn and Mr. Robb out of an abundance of caution to ensure that Temporary Solutions has their testimony available for use, if needed, at trial.

Following, Temporary Solutions’ pretrial filings, Plaintiff Deirdre Young (“Plaintiff” or “Ms. Young”) had 14 days in order to file objections to Temporary Solutions’ designations. *See*

Fed. R. Civ. P. 26(a)(3). (*See* Order, ECF No. 22 at 1.)

Plaintiff filed no objections. Thus, there are no objections related to Temporary Solutions' deposition designations that require rulings from the Court.

Temporary Solutions does not intend to rely on deposition designations in lieu of live testimony. However, to the extent any unforeseen circumstances occur closer to, or during trial, Temporary Solutions intends to rely on deposition designations previously submitted to the Court, upon which Plaintiff has entered no objections, to the extent it is necessary.

Respectfully submitted this 18th day of April, 2024.

[Signatures of Counsel on following page]

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*Attorneys for Defendant Temporary Solutions,
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CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2024, I filed the foregoing Temporary Solutions, Inc.'s Notice to the Court Regarding Deposition Designations using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

Dated: April 18, 2024.

By: /s/ Justin F. Ferraro

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